

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for [2008]

Date filed: [February 25, 2009]

Name of company covered by this certification: [Valley Telephone Cooperative, Inc.]

Form 499 Filer ID: [0001603042]

Name of signatory: [Kristi Lee]

Title of signatory: [COO – Commercial and Billing]

I, [Kristi Lee], certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company [is] in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company [has not] taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.  
If affirmative: [Provide explanation of any actions taken against data brokers]

The company [has not] received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).  
If affirmative: [Provide summary of all customer complaints received in the past year concerning the unauthorized release of CPNI.]

Signed





Valley Telephone Cooperative    Copper Valley Telephone    Valley Connections, LLC

Valley Telecommunications - Internet - Business Systems

February 17, 2009

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Valley Telephone Coop. Inc. (VTC) and its affiliates have established operating procedures that are designed to ensure compliance with the CPNI rules and requirements in Subpart U of Part 64 of the FCC's rules (47 C.F.R. 64.2001 through 64.2009).

VTC has trained and provided to all Customer Service Representatives (CSRs) a CPNI manual, which includes the disciplinary action that will be taken if a CPNI breach occurs. I, as VTC's Compliance Officer, have received signed employee certification forms following the above-mentioned training. Written procedures that comply with CPNI rules have also been distributed to CSRs. VTC provides CPNI updates and training to the appropriate employees every 6 months. Annually, certification forms are updated following training by the Compliance Officer.

VTC has mailed opt-out notices to all customers. If a customer chooses to opt-out, their selection is updated in the billing system. The opt-out status is accessible to all CSRs when accessing CPNI data. VTC's Marketing Department removes customers who have opted-out from applicable marketing efforts. Opt-out notices are mailed annually to all VTC customers.

VTC's customer information is kept on a secure server to prevent unauthorized access by hackers and unauthorized employee access. Authorized employees have unique system logins and passwords which determines the level of customer information they can access.

Hannah McElroy  
Compliance Officer Signature

Hannah McElroy  
Printed Name

2/17/09  
Date